

JAP:AK

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

TAMERA MARIE KEENEY,

P R E - A R R A I G N M E N T
C O M P L A I N T

(21 U.S.C. §§ 952(a) and 960)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JACK LEE, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 20, 2015, within the Eastern District of New York and elsewhere, the defendant TAMERA MARIE KEENEY did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

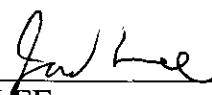
¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about January 20, 2015, the defendant TAMERA MARIE KEENEY arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York, aboard JetBlue Airways flight number 60 from Kingston, Jamaica.

2. The defendant TAMERA MARIE KEENEY was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented one carry-one bag for inspection, which was searched with negative results. During the examination, CBP officers noticed that the defendant appeared nervous and was avoiding eye contact. Based on the defendant’s behavior, a pat down search was requested from and authorized by a supervising CBP officer, which produced negative results. The defendant was then presented with an x-ray consent form which she read and stated she understood. The defendant was then transported to the medical facility at JFK, where the defendant removed a vaginal insert. The vaginal insert was probed, revealing a white, powdery substance that field tested positive for the presence of cocaine. Additionally, an x-ray was taken of the defendant’s intestinal tract. The x-ray was positive for foreign bodies. As of morning of January 20, 2015, the defendant had passed zero pellets.

3. The defendant TAMERA MARIE KEENEY will be detained at the JFK medical facility until such time as she passes all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant TAMERA MARIE KEENEY be dealt with according to law.



JACK LEE
Special Agent
HSI

Sworn to before me this
20th day of January, 2015

THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK